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11
12 **UNITED STATES DISTRICT COURT**
13
14 **DISTRICT OF NEVADA**

15 INVEST VEGAS LLC; MDM
16 CONSULTANTS, INC.

17 Plaintiff,
18 v.
19

20 21ST MORTGAGE CORPORATION; CAL-
21 WESTERN RECONVEYANCE
22 CORPORATION; NATIONAL CITY
23 MORTGAGE, A DIVISION OF
24 NATIONAL CITY BANK OF INDIANA;
25 COMMONWEALTH LAND TITLE
26 INSURANCE COMPANY; ONTARIO
27 CONDOMINIUM RENTAL SERVICES,
28 INC; HARLEE S. CARTER; LANA
CARTER; DARREN C. BOUTON; DOES I
through X, inclusive; ROE BUSINESS
ENTITIES I through X inclusive.

29 Defendants.
30
31

32 Case No.: 2:15-cv-00644-VCF

33
34 **STIPULATION AND ORDER TO EXTEND**
35 **PRE-TRIAL ORDER DEADLINE**

36
37 **(THIRD REQUEST)**

38 Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation
39 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record,
40 hereby stipulate and agree that the deadline to submit the Joint Pretrial Order in this matter be
41 continued by 14 days to allow for the Parties to fully prepare and discuss the various aspects of
42 trial. The Parties diligently discussed settlement prospects and participated in mediation which
43 concluded without resolution in the afternoon of July 15, 2021. Because of the length of the
44 mediation, the Parties have not had a sufficient opportunity to fully and thoroughly review the

1 various aspects of the Joint Pretrial Order and discuss what evidence will be presented at the time
2 of trial. Accordingly, the Parties are requesting that the current deadline to submit the Joint Pretrial
3 Order, currently scheduled for July 19, 2021, be extended to August 2, 2021. This is the third
4 stipulation of the Parties to continue this deadline. The relevant timeline has not lapsed as of the
5 submission of this Stipulation, and this additional time will allow the parties to further confer about
6 exhibits and witnesses to be presented at trial, and to timely submit a Joint Pretrial Order. Further,
7 this Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4. Therefore, the
8 Parties propose that the deadline for the Joint Pretrial Order be continued until August 2, 2021.

9
10 DATED this 19th day of July, 2021.

11 **SHUMWAY VAN**

12 By: /s/ Garrett R. Chase
13 GARRETT R. CHASE, ESQ.
14 Nevada Bar No. 14498
15 8985 S. Eastern Ave., Suite 100
16 Las Vegas, NV 89123
17 *Attorney for MDM Consultants, Inc.*

18 DATED this 19th day of July, 2021.

19 **HUTCHINSON & STEFFEN, PLLC**

20 By: /s/ Michael R. Brooks
21 MICHAEL R. BROOKS, ESQ.
22 Nevada Bar No. 7287
23 8985 S. Eastern Ave., Suite 100
24 Las Vegas, NV 89123
25 *Attorney for 21st Mortgage Corporation*

26 **SHUMWAY • VAN**
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ORDER

Upon Stipulation of the parties, and for good cause appearing therefore, IT IS HEREBY
ORDERED as follows:

a. Deadline to for Joint Pretrial Order: August 2, 2021.

IT IS SO ORDERED.

Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase

GARRETT R. CHASE, ESQ.
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From: Michael R. Brooks
To: Garrett R. Chase
Cc: Marina Scott
Subject: RE: 21st Mortgage adv. Invest Vegas
Date: Monday, July 19, 2021 2:29:50 PM

This looks fine.

From: Garrett R. Chase <Garrett@shumwayvan.com>
Sent: Monday, July 19, 2021 4:00 PM
To: Michael R. Brooks <mbrooks@hutchlegal.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas

Mike,

Attached is the proposed stipulation for your review. If it looks good, let me know and we'll get it submitted.

Best,

Garrett R. Chase, Esq.
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Yes, Not sure what happened. Send it over.

From: Garrett R. Chase <Garrett@shumwayvan.com>
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